

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:
MVK FARMCO LLC

Debtor(s).

*

* Case No. 23-11721-LSS

* Chapter 11

*

ALLY BANK

Movant.

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MVK FARMCO LLC

Debtor/Respondent

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**DECLARATION IN SUPPORT OF
MOTION FOR RELIEF FROM STAY**

PAUL TANGEN, pursuant to 28 U.S.C. § 1746, hereby deposes and states as follows:

1. I am the Bankruptcy Analyst of AIS Portfolio Services, LLC, the bankruptcy servicer and custodian of records for Ally Bank (“Movant”) in connection with the above captioned matter and I am authorized to, and do, make this affidavit in support of its motion for relief from stay (“Motion”) filed against the above referenced debtor (“Debtor(s)”) in this case.
2. I have reviewed the Motion and the facts alleged therein are true and correct to the best of my knowledge, information and belief.
3. The total arrears owed by the Debtor are as follows:

A.

Post-Petition Payments Due:		\$ 5,320.22		
Missed Payments 3	From 01/24/2024	To 03/24/2024	Payment Amount \$2,046.24	Unapplied Funds (\$818.50)

B. Late Charges: \$ \$0.00

MM YY to MM YY at the rate of \$000.00 per month

C. Advances for Taxes, Insurance, and the Like: \$ 0.00
\$ (818.50)

D. Suspense Balance: \$ 5,320.22

TOTAL ARREARS AS OF 04/04/2024

4. The following is a statement of the total amount to pay off the loan:

A. Unpaid Principal Balance: \$ 83,091.82

B. Total Accrued Interest: \$ 250.46
 covering 12/2023 to 04/2024

C. Late Charges: \$ 0.00
 MM YY to MM YY at the rate of \$000.00 per month

D. Recoverable Motion for Relief Attorney Fees: \$ 0.00

E. Recoverable Motion for Relief Filing Cost: \$ 0.00

F. Advances for Taxes, Insurance, and the Like: \$ 0.00

G. Unearned Interest: \$ 0.00

H. Other Charges: \$ 0.00

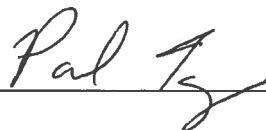
TOTAL OWED as of 04/04/2024 \$ 83,342.28

5. The Movant's good faith estimate of the value of the collateral is \$61,927.84. The basis for the estimate is a N.A.D.A. Official Used Car Guide Vehicle Valuation. See, Exhibit C.

6. The further information required in Local Rule 4001-1(c)(i)(A) including copies of the note and security instrument documents, are attached hereto as exhibits and such copies are true and accurate to the best of my knowledge, information and belief.

I DECLARE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

Executed on 4/12/24

A handwritten signature in black ink, appearing to read "Paul T. S." The signature is fluid and cursive, with "Paul" and "T." on the first line and "S." on the second line.